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U.S. STEEL - NOx CEMs

Enforcement Programs Section
EPA Region III

Background Information

- A. Copy of PA 25-123.51: Nitrogen Compound Emissions, Feb. 91. (2 pp).
- B. Letter of 3/29/93 from BAPC to U.S. Steel indicating requirements for CEM's. Six sources were listed; Clairton: No. 1 and No. 2 Boilers, ET: Riley Boilers No. 1, 2, & 3, and Clairton: Battery B. (2 pp)
- C. Letter of 5/4/93 from U.S. Steel to BAPC indicating desire to exempt Battery B from CEM requirements, and to use alternative methods of measuring NOx on the boilers. (4 pp)
- D. Letter of 6/2/93 from BAPC to U.S. Steel indicating BAPC consideration of parametric based monitoring if in accordance with state regulations, and request for certain information including a report addressing "extreme economic reasons." (1 p)
- E. Letter of 6/29/93 from U.S. Steel - Law Dept. requesting a ruling on requirements for CEMs on B Battery. (2 pp)
- F. Letter of 7/28/93 from BEQ/DAQ to U.S. Steel indicating BEQ will follow DER's lead in determining that B Battery is subject to requirements for CEMs. (3 pp)
- G. Letter of 8/4/93 from U.S. Steel to BEQ providing a protocol for testing and statistical analysis for the five boilers. (22 pp)

Note: Ed Taylor met with Lorraine Guevara to review protocol. Testing was performed in October. Test results are expected in the latter part of November.

AHF/ecr

(c) The Department may exempt a source from the requirements of subsection (b) if the Department determines that the installation of a continuous emission monitoring system would not provide accurate determination of emissions or that installation of a continuous emission monitoring system may not be implemented by a source due to physical plant limitations or to extreme economic reasons. The Department will require such an exempted source to fulfill alternative emission monitoring and reporting requirements.

(d) The Department may use the data from the monitoring devices or from the alternative monitoring systems required by this section to enforce the visible emission limitations defined in this article.

(e) Compliance with this section shall be obtained no later than 18 months after the effective date of the listing of any source identified in subsection (a). The Department may grant orders providing reasonable extension of time for sources that have made good faith efforts to install, operate and maintain continuous monitoring devices but have been unable to complete such operations within the time period provided.

Authority

The provisions of this § 123.46 issued under act of January 8, 1960 (P. L. 2119, No. 787) (35 P. S. §§ 4001—4015).

Source

The provisions of this § 123.46 adopted June 19, 1981, effective June 20, 1981, 11 Pa.B. 2132; corrected June 26, 1981, effective June 20, 1981, 11 Pa.B. 2225.

NITROGEN COMPOUND EMISSIONS

§123.51. Monitoring requirements.

(a) This section applies to combustion units with a rated heat input of 250 million Btus per hour or greater and with an annual average capacity factor of greater than 30%.

(b) Sources subject to this section shall install, operate and maintain continuous nitrogen oxides monitoring systems and other monitoring systems to convert data to required reporting units in compliance with Chapter 139 Subchapter C (relating to requirements for continuous in-stack monitoring for stationary sources).

(c) Sources subject to this section shall submit results on a regular schedule and in a format acceptable to the Department and in compliance with Chapter 139 Subchapter C.

(d) Continuous nitrogen oxides monitoring systems installed under the requirements of this section shall meet the minimum data availability requirements in Chapter 139 Subchapter C.

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(e) The Department may exempt a source from the requirements of subsection (b) if the Department determines that the installation of a continuous emission monitoring system would not provide accurate determination of emissions or that installation of a continuous emission monitoring system cannot be implemented by a source due to physical plant limitations or to extreme economic reasons. A source exempted from the requirements of subsection (b) shall satisfy alternative emission monitoring and reporting requirements proposed by the source and approved by the Department which provide oxides emission data that is representative of actual emissions of the source.

(f) Sources subject to this section shall comply by October 20, 1993, unless the source becomes subject to the requirements later than October 20, 1990. For sources which become subject to the requirements after October 20, 1990, the source has 36 months from the date the source becomes subject to this section. The Department may issue orders providing a reasonable extension of time for sources that have made good faith efforts to install, operate and maintain continuous monitoring devices, but that have been unable to complete the operations within the time period provided.

Authority

The provisions of this § 123.51 issued under the act of January 8, 1960 (P. L. 2119, No. 787) (35 P. S. §§ 4001—4015).

Source

The provisions of this § 123.51 adopted October 19, 1990, effective October 20, 1990, 20 Pa.B. 5291.